

**Jordan M. Jeansonne**

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**From:** Brian Page <brian.page@attorneyguss.com>  
**Sent:** Wednesday, July 3, 2019 12:10 PM  
**To:** Jordan M. Jeansonne  
**Subject:** RE: 52870/Joel Lewis v. Underwriters at Lloyd's, London, et al  
**Attachments:** Letter with CMRRR sent out.pdf; Service attempt via CMRRR on Jamaria J. Graham - unsuccessful.pdf; Signed Green Card 1.pdf; Signed Green Card 2.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Good Afternoon Jordan,

Please see attached. It looks like the only ones that were successful were to Llyods and USA Transportation Services LLC. Will you be voluntarily answering on behalf of Mr. Graham or will I need to hire a process server to get him formally served?

I look forward to working with you also.



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Brian Page  
*Associate Attorney*  
*Stewart J. Guss, Injury Accident Lawyers*  
400 Poydras St. Suite 1975  
New Orleans, Louisiana 70130  
(504) 475-4970 Telephone  
(833) 874-6580 Facsimile  
[AttorneyGuss.com](http://AttorneyGuss.com)  
[Brian.Page@AttorneyGuss.com](mailto:Brian.Page@AttorneyGuss.com)



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**From:** Jordan M. Jeansonne <jjeansonne@perrierlacoste.com>  
**Sent:** Wednesday, July 3, 2019 9:43 AM

**EXHIBIT B**

**To:** Brian Page <brian.page@attorneyguss.com>  
**Cc:** # P&L Files Active <files@perrierlacoste.com>  
**Subject:** RE: 52870/Joel Lewis v. Underwriters at Lloyd's, London, et al  
**Importance:** High

Good Morning Brian,

I am the handling attorney in this matter. I am in receipt of your below email and thank you for that information.

I am working to verify service on the defendants at this time. Do you have affidavits of service and/or certified mail receipts for the long arm service requested on the defendants? If so, please send me a copy at your soonest convenience. I spoke to the driver (Jamarie Graham) shortly ago and he advised he was not living at the address listed in the police report at any time after the citation was issued (5/30/19).

Look forward to working with you on this one.

Best,

**Jordan M. Jeansonne**  
Perrier & Lacoste, LLC  
One Canal Place  
365 Canal Street, Suite 2550  
New Orleans, Louisiana 70130

Email: [jjeansonne@perrierlacoste.com](mailto:jjeansonne@perrierlacoste.com)  
Direct Telephone: (504) 212-8845  
Direct Facsimile: (504) 212-7295

THIS IS A CONFIDENTIAL COMMUNICATION. The message and information contained in, or attached to, this communication is privileged and confidential and intended only for the person named above. If you are not the intended recipient of this message, please delete it immediately without opening any attachments. Please notify the sender, **Jordan M. Jeansonne**, Perrier & Lacoste, LLC by telephone at 504-212-8820 or by email at [jjeansonne@perrierlacoste.com](mailto:jjeansonne@perrierlacoste.com) that you received the e-mail in error. Thank you.

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**From:** Brian Page [<mailto:brian.page@attorneyguss.com>]  
**Sent:** Wednesday, June 26, 2019 11:44 AM  
**To:** Guy D. Perrier  
**Cc:** # P&L Files Active; Nancy F. DiMaggio; Keisha Muslar  
**Subject:** RE: 52870/Joel Lewis v. Underwriters at Lloyd's, London, et al

Guy,

I just heard from my client today and it reminded me of your June 6<sup>th</sup>, 2019 letter wherein you requested to be informed if my client "has received a recommendation to undergo or schedule any type of surgery or any other invasive procedure." Although I'm not sure what you would consider invasive, please be advised that my client has previously had and has been recommended an additional CESI by Michael S. Haydel, MD, FIPP, ABIPP with Haydel Spine Pain & Wellness in Houma. These procedures were performed at Gulf Coast Surgical Center, LLC in Houma. According to their website:

"Dr. Michael Haydel is a Pain Management Specialist practicing at Haydel Spine and Pain Specialty Care Center in Lafayette and Houma. Dr. Haydel is Board Certified in Anesthesiology by the American Board of Anesthesiology. He is also Board Certified in Interventional Pain Management by the American Board of Interventional Pain Physicians, and he is a Fellow of the Interventional Pain Physicians by the World Institute of Pain."

The CESI has not yet been scheduled at this time and Dr. Haydel has informed Mr. Lewis that he will likely need an RFA after this next CESI.

Please note that I first discussed the potential that Mr. Lewis was going to undergo CESIs with adjuster Gina Hendren on November 13, 2018 via email. I again spoke with her on 3/28/19 and let her know that Mr. Lewis had undergone 2 CESI procedures at that time and that RFAs had been discussed but not recommended yet.

I know you are still under extension to Answer our Petition but wanted to keep you in the loop as my client called in today with an update. Let me know if you have any questions regarding this email or any other aspect of this case as I know you are just getting on board. I look forward to working with you and request that you reach out if you need anything more.



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Brian Page  
*Associate Attorney*  
*Stewart J. Guss, Injury Accident Lawyers*  
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**From:** Nancy F. DiMaggio <[ndimaggio@perrierlacoste.com](mailto:ndimaggio@perrierlacoste.com)>  
**Sent:** Thursday, June 6, 2019 1:14 PM  
**To:** SJG Pleadings <[SJG-Service@attorneyguss.com](mailto:SJG-Service@attorneyguss.com)>  
**Cc:** Guy D. Perrier <[gperrier@perrierlacoste.com](mailto:gperrier@perrierlacoste.com)>; # P&L Files Active <[files@perrierlacoste.com](mailto:files@perrierlacoste.com)>  
**Subject:** 52870/Joel Lewis v. Underwriters at Lloyd's, London, et al

Mr. Page - Please see attached correspondence from Guy Perrier regarding the above referenced matter. Thanks.

Nancy DiMaggio  
Legal Assistant to  
Guy D. Perrier, Rodney J. Lacoste, Jr.  
& Cory T. Stuart

Perrier & Lacoste, LLC

T: 504-212-8837 F: 504-212-8858

[ndimaggio@perrierlacoste.com](mailto:ndimaggio@perrierlacoste.com)

7018 1130 0001 8916 5854

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Jamaria J. Graham  
Through the Louisiana Long Arm  
Statute  
2219 Riverford Drive  
Kingwood, Texas 77339

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7206/26/19

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BC: 77070462572 2091N177200-01554

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2019  
JUL 11

SS

Jamaria J. Graham  
Through the Louisiana Long Arm  
Statute  
2219 Riverford Drive  
Kingwood, Texas 77339

~~6-07-19~~  
6-07-19

XIE 773 CC 1 7206/26/19  
RETURN TO SENDER  
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**1. Article Addressed to:**

Jamaria J. Graham  
Through the Louisiana Long Arm  
Statute  
2219 Riverford Drive  
Kingwood, Texas 77339



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**2. Article Number (Transfer from service label)****COMPLETE THIS SECTION ON DELIVERY****A. Signature****X**☐ Agent☐ Addressee**B. Received by (Printed Name)****C. Date of Delivery**

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If YES, enter delivery address below: ☐ No

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| <input type="checkbox"/> Certified Mail Restricted Delivery            | <input checked="" type="checkbox"/> Return Receipt for Merchandise  |
| <input type="checkbox"/> Collect on Delivery                           | <input type="checkbox"/> Signature Confirmation™                    |
| <input type="checkbox"/> Collect on Delivery Restricted Delivery       | <input type="checkbox"/> Signature Confirmation Restricted Delivery |
| <input type="checkbox"/> Insured Mail                                  |   |
| <input type="checkbox"/> Insured Mail Restricted Delivery (over \$500) |   |

PS Form 3811, July 2015 PSN 7530-02-000-9053

Domestic Return Receipt

## CITATION

JOEL LEWIS

VERSUS

UNDERWRITERS AT LLOYD'S, LONDON,  
ET AL

Case: 00134235

Division: B

State of Louisiana

16<sup>th</sup> Judicial District Court

Parish of Iberia

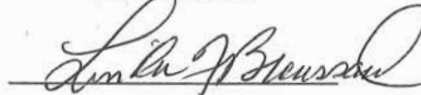
To: USA TRANSPORTATION SERVICES LLC  
 THROUGH THE LOUISIANA LONG ARM STATUTE  
 ON THEIR REGISTERED AGENT  
 JAVIER MOYANO  
 15447 AVENUE C  
 CHANNELVIEW, TX 77530

of Parish

You are hereby summoned to comply with the demand contained in the **PETITION FOR DAMAGES, FIRST SET OF INTERROGATORIES AND REQUEST FOR PRODUCTION OF DODUMENTS** of which a true and correct copy (exclusive of exhibits) accompanies this citation, or make an appearance, either by filing a pleading or otherwise, the 16th Judicial District Court in and for the Parish of Iberia, State of Louisiana, within thirty (30) days after the service hereof, under penalty of default.

WITNESS MY HAND AND OFFICIAL SEAL OF OFFICE AT NEW IBERIA, LOUISIANA, THIS  
30<sup>th</sup> DAY OF MAY, 2019.

Michael Thibodeaux  
 Clerk of Court  
 16<sup>th</sup> Judicial District Court  
 Parish of Iberia



Deputy Clerk of Court

Requested by:  
 BRIAN PAGE  
 400 POYDRAS STREET, SUITE 1975  
 NEW ORLEANS, LA 70130

[ORIGINAL]

701A 1130 0001 8916 5885

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Extra Services & Fees (check box, add fee as appropriate)	
<input type="checkbox"/> Return Receipt (hardcopy) \$	
<input type="checkbox"/> Return Receipt (electronic) \$	
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Postage \$	
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EXHIBIT C




ates, PLLC  
ite 297  
070



7018 1130 0001 8916 5885

USA Transportation Services LLC  
Through the Louisiana Long Arm  
Statute on their Registered Agent  
Javier Moyano  
15447 Avenue C  
Channelview, Texas 77530



SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<p>■ Complete items 1, 2, and 3.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p>	<p>A. Signature <input checked="" type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee</p> <p>X <i>J. Moyano</i></p>
<p>1. Article Addressed to:</p> <p>USA Transportation Services LLC Through the Louisiana Long Arm Statute on their Registered Agent Javier Moyano 15447 Avenue C Channelview, Texas 77530</p>	<p>B. Received by (Printed Name) C. Date of Delivery</p> <p><i>J. Moyano</i> <i>6/17/19</i></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If YES, enter delivery address below:</p>
<p></p> <p>7018 1130 0001 8916 5885</p>	<p>3. Service Type</p> <p><input type="checkbox"/> Adult Signature <input type="checkbox"/> Priority Mail Express®</p> <p><input type="checkbox"/> Adult Signature Restricted Delivery <input checked="" type="checkbox"/> Registered Mail™</p> <p><input checked="" type="checkbox"/> Certified Mail® <input type="checkbox"/> Registered Mail Restricted Delivery</p> <p><input type="checkbox"/> Certified Mail Restricted Delivery <input checked="" type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Signature Confirmation™</p> <p><input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Signature Confirmation Restricted Delivery</p> <p><input type="checkbox"/> Insured Mail</p> <p><input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</p>
<p>2. Article Number (Transfer from service label)</p>	
<p>PS Form 3811, July 2015 PSN 7530-02-000-9053</p>	<p>Domestic Return Receipt</p>